

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23-20062

-vs-

Hon. Victoria A. Roberts

IBRAHIM SAMMOUR, D-5,

Defendant.

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**NOTICES AND DEMANDS IN COMPLIANCE  
WITH STANDING ORDER AND FEDERAL RULES**

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Defendant, Ibrahim Sammour, through his counsel, Mitchell T. Foster, provides the following notices and demands:

1. It is hereby requested that the Government provide forthwith the following information, and where applicable, to provide copies or an opportunity to make copies of:

a. Any information and documents within the meaning of the "Standing Order", paragraph 1(a), and/or Rule 16(a)(1) of the Federal Rules of Criminal Procedure;

b. Any favorable evidence within the meaning of the "Standing Order", paragraph 1(b), and / or *Brady v Maryland*, 373 U.S. 83 (1963), and *Giglio v United States*, 405 U.S. 150 (1972), including, but not limited to:

i. All consideration or promises of consideration given to or on behalf of a witness or expected or hoped for by a witness;

ii. All threats or coercion made or directed against a witness or persons of concern to the witness, including, but not limited to threats of criminal prosecution or investigation, or threats of civil or tax litigation or investigation;

iii. All records or information revealing prior felony convictions, misdemeanor convictions or juvenile adjudications of the Defendant and any witness the government intends to call at trial; and

iv. The existence and identification of each occasion known to the government on which any witness the

government intends to call at trial may have testified falsely under oath, or submitted false affidavits in connection with proceedings of any kind, including, but not limited to forfeiture proceedings, or each occasion known to the government of which any witness the government intends to call at trial may have made inconsistent statements in connection with this case, and a summary of such inconsistent statements.

c. Any document which will be used to refresh the memory of a witness within the meaning of the “Standing Order”, paragraph 8, and / or FRE 612;

d. Any statement of witnesses within the meaning of 18 USC 3500(e); and

e. Notice of any “other acts” evidence which the government intends to introduce at trial, pursuant to FRE 404(b)(2).

2. Notice is hereby given pursuant to the “Standing Order”, paragraph 5(b), that the foundation for any and all exhibits

will be contested, and paragraph 6 that the chain of their custody will be contested.

3. Notice is hereby given pursuant to the “Standing Order”, paragraph 7, that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the witness’ testimony under FRE 1006.

4. All requests for information, materials, or evidence contained herein are continuing ones and the government is requested to immediately provide any additional information, materials, or evidence as required by the “Standing Order”, paragraph 3 and / or Rule16(c) of the Federal Rules of Criminal Procedure.

5. Pursuant to Rule 16(a)(1)(A) of the Federal Rules of Criminal Procedure, Defendant requests disclosure of the substance of any relevant oral statement made by Defendant, before or after arrest, in response to interrogation by a person

Defendant knew was a government agent if the government intends to use the statement at trial.

6. Pursuant to Rule 16(a)(1)(B) of the Federal Rules of Criminal Procedure, Defendant requests disclosure of any relevant written or recorded statement by Defendant, the portion of any written record containing the substance of any relevant or oral statement made before or after arrest if Defendant made the statement in response to interrogation by a person Defendant knew was a government agent, and Defendant's recorded testimony before a grand jury relating to the charged offense.

7. Pursuant to Rule 16(a)(1)(D) of the Federal Rules of Criminal Procedure, Defendant requests a copy of his prior criminal record that is within the government's possession, custody or control.

8. Pursuant to Rule 16(a)(1)(E) of the Federal Rules of Criminal Procedure, Defendant requests permission to inspect and / or to copy or photograph all pictures, books, papers, documents,

data, tangible objects, buildings or places that are within the government's possession, custody or control and that meet the requirements set forth in the rule.

9. Pursuant to Rule 16(a)(1)(F) of the Federal Rules of Criminal Procedure, Defendant requests permission to inspect and to copy or photograph the results or reports of any physical or mental examination and of any scientific test or experiment that is within the government's possession, custody, or control and that meet the requirements set forth in the rule.

10. Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, Defendant requests written disclosure of each expert witness the government intends to call at trial, and for each such expert witness the following:

- a complete statement of all opinions that the government will elicit from the witness in its case- in-chief, or during its rebuttal to counter testimony that the defendant has

timely disclosed under Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure;

- the bases and reasons for them;
- the witness's qualifications, including a list of all publications authored in the previous 10 years; and
- a list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition; and

The information required by (iii) for any testimony that the government intends to use at trial under Federal Rule of Evidence 702, 703, or 705 during its case-in-chief, or during its rebuttal to counter testimony that the defendant has timely disclosed under (b)(1)(C).

10. Notices contained herein will remain in effect unless expressly withdrawn.

Respectfully submitted,

**MITCHELL T. FOSTER, P.C.**

Attorney for Defendant

Dated: April 27, 2023

s/ ***Mitchell T. Foster***

Mitchell T. Foster  
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### CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2023, I electronically filed the foregoing “notices and demands in compliance with standing order and federal rules” with the clerk of the court using the ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

**MITCHELL T. FOSTER, P.C.**  
Attorney for Defendant

Dated: April 27, 2023

s/ ***Mitchell T. Foster***

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